

Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

0061568

04-AMCP-0245

APR 6 2004

Mr. Nicholas Ceto, Program Manager
Office of Environmental Cleanup
Hanford Project Office
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

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APR 14 2004

EDMC

Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 W. Fourth Avenue
Kennewick, Washington 99336

Addressees:

**MODIFY REGULATORY DESIGNATION AND LEAD AGENCY FOR SELECTED
200-LW-1 OPERABLE UNIT (OU) (HANFORD FEDERAL FACILITY AGREEMENT AND
CONSENT ORDER [TRI-PARTY AGREEMENT]) CHANGE REQUEST C-03-02**

Appendix C of the Tri-Party Agreement (Enclosure 1) lists Hanford Site waste sites that potentially require remediation. When the U.S. Department of Energy, Richland Operations Office, the U.S. Environmental Protection Agency (EPA) and the State of Washington Department of Ecology (Ecology), hereinafter referred to as the Parties, first negotiated the Hanford Site cleanup program, the waste sites were divided into OUs based primarily on the presence or absence of Resource Conservation and Recovery Act treatment, storage, or disposal facilities within the OU.

The Parties have agreed that cleanup of waste sites in the BC Cribs and Trenches area is a high priority. Consolidation of all waste sites in this area into a single OU streamlines the regulatory process for remediation by consolidating resources on the review and decision-making process into a single, lead regulatory agency (EPA). The Parties propose the reassignment of four waste sites in the 200-LW-1 OU to the 200-TW-1 OU. The changes to Appendix C are included as pages 3 and 4 of the Tri-Party Agreement change package.

The enclosed Tri-Party Agreement Change Request, C-03-02 (Enclosure 2), formalizes this approach and has been reviewed by Dennis Faulk and Craig Cameron, EPA, and John Price, Ecology. In accordance with Tri-Party Agreement Action Plan, Section 12.0, Changes to the Agreement, the Parties have 14 days following receipt of a signed change package to act on the change package.

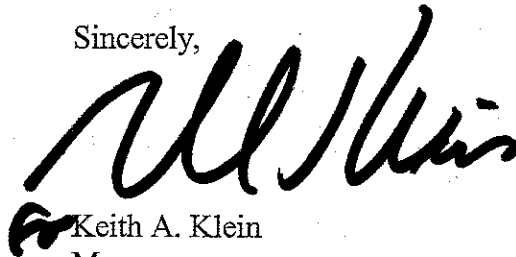
Addressees
04-AMCP-0245

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APR 6 2004

If you have questions, please contact me, or your staff may contact Matt McCormick, Assistant Manager for the Central Plateau, on (509) 373-9971.

Sincerely,

A handwritten signature in black ink, appearing to read 'Keith A. Klein', written over a horizontal line.


Keith A. Klein
Manager

AMCP:BLF

Enclosures

cc w/encls:

D. Bartus, EPA
M. W. Benecke, FHI
L. D. Crass, FHI
L. J. Cusack, Ecology
B. H. Ford, FHI
S. Harris, CTUIR
J. S. Hertzels, FHI
R. Jackson, FHI
R. Jim, YN
T. Martin, HAB
R. D. Morrison, FHI
K. Niles, ODOE
R. E. Piippo, FHI
P. Sobotta, NPT
M. Todd-Robertson, FHI
R. T. Wilde, FHI
J. A. Winterhalder, FHI
Administrative Record H6-08

Change Number	Federal Facility Agreement and Consent Order		Date:
C-03-02	Change Control Form Do not use blue ink. Type or print using black ink.		April 1, 2004
Originator: B. L. Foley, RL/D. E. Jackson, RL		Phone: 509-376-7087/509- 376-8086	
Class of Change:			
<input type="checkbox"/> I - Signatories		<input checked="" type="checkbox"/> II - Executive Manager	<input type="checkbox"/> III - Project Manager
Change Title:			
Modify Regulatory Designation and Lead Agency for Selected 200-LW-1 Waste Sites (Appendix C)			
Description/Justification of Change:			
<p>Appendix C of the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) lists Hanford waste sites that potentially require remediation. When the U.S. Department of Energy (RL), the U.S. Environmental Protection Agency (EPA) and the State of Washington, Department of Ecology (Ecology), hereinafter referred to as the Parties, first negotiated the Hanford Site cleanup program, the waste sites were divided into operable units (OU's). Each OU (and the waste sites contained therein) was defined as either a Resource Conservation and Recovery Act (RCRA) Past Practice Unit (RPP) or a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Past Practice Unit (CPP) based primarily on the presence or absence of RCRA treatment, storage, or disposal facilities within the OU.</p> <p>The Parties have agreed that cleanup of waste sites in the BC Cribs and Trenches area is a high priority. Consolidation of all waste sites in this area into a single OU will streamline the regulatory process for remediation by focusing resources on the review and decision-making process into a single, lead regulatory agency (EPA). Therefore, the Parties propose to consolidate the response for four waste sites in the 200-LW-1 OU with the immediately adjacent waste sites in the 200-TW-1 OU. The four affected waste sites (216-B-53A, 216-B-53B, 216-B-54, and 216-B-58) will move from the 200-LW-1 OU to the 200-TW-1 OU. They will also be changed from RPP to CPP sites.</p> <p>The changes to Appendix C are included as pages 3 and 4 of this change package. Changes to Appendix C are denoted as redline/strikeout for modification/deletion and shading for additions.</p>			
Impact of Change:			
Changes to Appendix C and lead regulatory agency; no impact to Tri-Party Agreement milestones or schedule.			
Affected Documents:			
The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford Site internal planning management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents; Multi-Year Work Plan); Sitewide Systems Engineering Control Documents; Project Management Plans, future revisions to the 200-LW-1 and 200-TW-1 documents, and, if appropriate, LDR Report requirements.			
Approvals:			
 Joel Hebdon, RL IAMIT Representative	4/05/04 Date	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
N/A James E. Rasmussen, ORP IAMIT Representative	_____ Date	<input type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
_____ Nick Ceto, EPA IAMIT Representative	_____ Date	<input type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
_____ Michael A. Wilson, Ecology IAMIT Representative	_____ Date	<input type="checkbox"/> Approved	<input type="checkbox"/> Disapproved

Appendix C

Listing by Operable Unit. (Sheet 56 of 89)

OPERABLE UNIT LEAD REGULATORY

Waste Unit	Waste Unit Aliases	Unit Type	Status
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200-IS-1 (continued)

UPR-200-W-114	UPR-200-W-114, UN-216-W-24, Ground Contamination East of 241-SX Tank Farm, UN-200-W-114	Unplanned Release	
UPR-200-W-115	UPR-200-W-115, UN-216-W-25, Ground Contamination above Transfer Line Along Cooper Street	Unplanned Release	
UPR-200-W-131	UPR-200-W-131, Release from 241-TX-155	Unplanned Release	
UPR-200-W-135	UPR-200-W-135, Release from 241-TX-155, UN-200-W-135	Unplanned Release	
UPR-200-W-160	UPR-200-W-160, Line Break at 241-TX-302C, UPR-200-W-38,	Unplanned Release	
UPR-200-W-161	UPR-200-W-161, UN-216-W-35, UN-200-W-161	Unplanned Release	
UPR-200-W-164	UPR-200-W-164, Overhead UNH Line Leak, UN-216-W-29	Unplanned Release	
UPR-200-W-167	UPR-200-W-167, Contamination Migration from 241-TY, UN-216-W-32	Unplanned Release	

200-LW-1

Ecology

RPP

216-B-53A	216-B-53A, 216-B-53A Trench, PRTR Trench	Trench
216-B-53B	216-B-53B, 216-B-53 Trench, 216-B-53B	Trench
Trench	Trench	
216-B-54	216-B-54, 216-B-54 Trench	Trench
216-B-58	216-B-58, 216-B-58 Trench, 216-B-59 Crib	Trench
216-T-27	216-T-27, 216-TY-2 Cavern, 216-TY-2 Crib, 216-TX-2 Cavern, 216-TX-2 Crib	Crib
216-T-28	216-T-28, 216-TY-3 Cavern, 216-TY-3 Crib, 216-TX-3 Cavern, 216-TX-3 Crib	Crib
216-T-34	216-T-34, 216-T-34 Crib	Crib
216-T-35	216-T-35, 216-T-35 Crib	Crib

Appendix C

Listing by Operable Unit. (Sheet 76 of 89)

OPERABLE UNIT LEAD REGULATORY

Waste Unit	Waste Unit Aliases	Unit Type	Status
200-TW-1 (continued)			
EPA		CPP	
216-B-42	216-B-42, 241-BX-8 Grave, 216-BX-8 Trench, 216-B-42 Trench	Trench	
216-B-43	216-B-43, 216-BY-1 Crib, 216-BY-1 Cavern	Crib	
216-B-44	216-B-44, 216-BY-2 Crib, 216-BY-2 Cavern	Crib	
216-B-45	216-B-45, 216-BY-3 Crib, 216-BY-3 Cavern	Crib	
216-B-46	216-B-46, 216-BY-4 Crib, 216-BY-4 Cavern	Crib	
216-B-47	216-B-47, 216-BY-5 Crib, 216-BY-5 Cavern	Crib	
216-B-48	216-B-48, 216-BY-6 Crib, 216-BY-6 Cavern	Crib	
216-B-49	216-B-49, 216-BY-7 Crib, 216-BY-7 Cavern	Crib	
216-B-51	216-B-51, 216-BY-9 Crib	French Drain	
216-B-52	216-B-52, 216-B-52 Trench, 216-BC-22	Trench	
216-B-53A	216-B-53A, 216-B-53A Trench, PRTR Trench	Trench	
216-B-53B	216-B-53B, 216-B-53 Trench, 216-B-53B Trench	Trench	
216-B-54	216-B-54, 216-B-54 Trench	Trench	
216-B-58	216-B-58, 216-B-58 Trench, 216-B-59 Crib	Trench	
216-BY-201	216-BY-201, 241-BY Flush Tank, 216-BY-47, Supernatant Disposal Flush Tank, IMUST, Inactive Miscellaneous Underground Storage Tank	Settling Tank	
200-E-14	200-E-14, 216-BC-201 Siphon Tank, 216-B-201, IMUST, Inactive Miscellaneous Underground Storage Tank	Storage Tank	
200-E-114	200-E-114, Pipeline from 241-BY Tank Farm to 241-C Tank Farm and BC Cribs Trenches	Tank Farm Process Piping	
216-T-18	216-T-18, Test Crib for 221-U Building, Scavenged TBP Waste, 216-T-17, 241-T-17 Crib	Crib	
216-T-26	216-T-26, 216-TY-1 Cavern, 216-TY-1 Crib, 241-TX-1 Cavern, 216-TX-1 Crib	Crib	
UPR-200-E-9	UPR-200-E-9, Liquid Overflow at 216-BY-201, UN-200-E-9	Unplanned Release	